IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

BABY DOE, et al.,)
Plaintiffs,)
v.)
JOSHUA MAST, et al.,)) Case No. 3:22-cv-00049-NKM
Defendants,) Case No. 3:22-cv-00049-NKIVI
and)
UNITED STATES SECRETARY OF)
STATE ANTONY BLINKEN, et al.,)
Nominal Defendants.))

MOTION FOR PRO HAC VICE ADMISSION OF MICHAEL L. FRANCISCO

Pursuant to Rule 6(d) of the Court's Local Civil Rules, John S. Moran, counsel for Defendants Joshua and Stephanie Mast, hereby moves for this Court to admit Michael L. Francisco to practice *pro hac vice* in the above-captioned matter. In support of this motion, counsel respectfully represents the following:

- 1. Mr. Francisco has specialized knowledge of the facts of this case.
- 2. Mr. Francisco is not a member of the bar of this Court and is not licensed to practice in the Commonwealth of Virginia.

3. Mr. Francisco is licensed to practice and a member of good standing of the Bars of District

of Columbia (Bar No. 90005564) and Colorado (Bar No. 39111) and is admitted to the

following courts:

U.S. District Court for the District of Colorado

U.S. Court of Appeals for the 4th Circuit

U.S. Court of Appeals for the 6th Circuit

U.S. Court of Appeals for the 11th Circuit

U.S. Court of Appeals for the 10th Circuit

U.S. Court of Appeals for the District of Columbia Circuit

Supreme Court of the United States

4. Mr. Francisco is of good character and standing and has the requisite experience and

professionalism to appear before this Court.

WHEREFORE, counsel respectfully requests the Court admit Michael L. Francisco pro hac

vice to practice before this Court solely in the above-captioned matter. Counsel also moves that

the Court exercise its discretion to allow Mr. Francisco to "appear at hearings or trials in the

absence of an associated member" pursuant to Local Rule 6(d).

Respectfully submitted this 13th day of July 2023.

/s/ John S. Moran

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